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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

CHRISTOPHER WISE, MICHAEL
MARTINEZ, CHRISTOPHER DURKEE, and
SAVANNAH GUEST, individuals,

Plaintiffs,

v.

CITY OF PORTLAND, a municipal
corporation; OFFICER STEPHEN B.
PETTEY, in his individual capacity; JOHN
DOES 1-60, individual and supervisory
officers of Portland Police Bureau; U.S.
DEPARTMENT OF HOMELAND
SECURITY; U.S. MARSHALS SERVICE;
JOHN DOES 61-100, individual and
supervisory officers of the federal government,

Defendants.

Case No. 3:20-cv-01193-IM

**DECLARATION OF NATHAN
R. MORALES IN SUPPORT OF
PLAINTIFFS' AMENDED
SECOND MOTION FOR
EXTENSION OF TIME TO
IDENTIFY AND SERVE DOE
DEFENDANTS**

1- DECLARATION OF NATHAN R. MORALES IN
SUPPORT OF PLAINTIFFS' AMENDED SECOND
MOTION FOR EXTENSION OF TIME

I, Nathan R. Morales, declare as follows:

1. I am an attorney with the law firm Perkins Coie LLP, and am counsel of record for Plaintiffs in this case. I am over the age of 18 and if called as a witness I could testify competently to the facts below.

2. Since Plaintiffs issued discovery requests to the City concerning the identities of the Doe Defendants, the City and Plaintiffs have had a number of conferrals about how to identify those individuals. The City issued its own discovery requests to Plaintiffs, to assist in this task, and Plaintiffs intend to provide responses to the City this week.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 9, 2021

/s/ Nathan R. Morales
Nathan R. Morales

DATED: September 9, 2021

PERKINS COIE LLP

By: /s/ Nathan R. Morales

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2- DECLARATION OF NATHAN R. MORALES IN
SUPPORT OF PLAINTIFFS' AMENDED SECOND
MOTION FOR EXTENSION OF TIME